IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

IN RE:	§	
	§	CASE NO. 19-50900-CAG-7
LEGENDARY FIELD	§	
EXHIBITIONS, LLC, ET AL.,	§	CHAPTER 7
	§	
DEBTORS.	***	
	§	
	§	
	§	
RANDOLPH N. OSHEROW,	§	
Chapter 7 Trustee of the Bankruptcy	§	
Estates of Legendary Field Exhibitions, LLC	C;§	
AAF Players, LLC; AAF Properties, LLC;	§	
Ebersol Sports Media Group, Inc.;	§	
LFE 2, LLC; and We Are Realtime, LLC,		
	\$ \$ \$ \$ \$ \$	
PLAINTIFF,	§	
	§	
V.	§	ADV. PROC. NO. 22-05078-cag
	§	
DUNDON CAPITAL PARTNERS, LLC;	§	
THOMAS DUNDON; AND	<i>\$</i> \$\to\$ \$\	
JOHN ZUTTER,	§	
	§	
DEFENDANTS.	§	

CHAPTER 7 TRUSTEE'S WITNESS AND EXHIBIT LIST

Plaintiff RANDOLPH N. OSHEROW (the "<u>Trustee</u>"), as the Chapter 7 Trustee of the Bankruptcy Estates of Legendary Field Exhibitions, LLC ("<u>LFE</u>"); AAF Players, LLC ("<u>AAF Players</u>"); AAF Properties, LLC ("<u>AAF Properties</u>"); Ebersol Sports Media Group, Inc. ("<u>ESMG</u>"); LFE 2, LLC ("<u>LFE 2</u>"); and We Are Realtime, LLC ("<u>Realtime</u>") (collectively, "<u>Debtors</u>") files this Witness and Exhibit List for use in connection with the hearing on Defendants Thomas Dundon and Dundon Capital Partners, LLC's Motion for Leave to Supplement Summary

Judgment Evidence [ECF No. 252] (the "Motion"), to be held in the above-referenced matter, set for **Thursday**, **February 20**, **2025**, **at 9:30 a.m**.

WITNESSES

Trustee may call the following witnesses to testify at any hearing on the Motion, whether in person or by affidavit, declaration or proffer:

Ex. No.	Description
1	Any witnesses called or designated by any other party; and
2	Any witnesses necessary to rebut or impeach the testimony of any witness called or designated by another party.

Trustee reserves the right to amend and supplement this witness list.

EXHIBITS

Trustee may offer into evidence any one or more of the following exhibits¹ at the hearing on the Motion:

Ex. No.	Description
	Any exhibit identified or offered by any other party.
	Any rebuttal exhibit.
	Any exhibit necessary for impeachment purposes.

Trustee reserves the right to amend and supplement this exhibit list.

RESERVATION OF RIGHTS

The foregoing witness and exhibit list is being submitted based on information reasonably available to Trustee at this time and without waiving any objection as to relevance, materiality, or admissibility of evidence in this litigation. Trustee reserves the right to ask the Court to take

¹ Each exhibit listed includes any attachments or exhibits thereto, unless otherwise noted herein. CHAPTER 7 TRUSTEE'S WITNESS AND EXHIBIT LIST

judicial notice of pleadings, transcripts, and/or other documents, and to supplement or amend this

Witness and Exhibit List at any time before any hearing held on the Motion.

Dated: February 19, 2025 Respectfully submitted,

/s/ Katharine Battaia Clark

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ATTORNEYS FOR PLAINTIFF RANDOLPH N. OSHEROW, CHAPTER 7 TRUSTEE, DEBTORS' ESTATE

CERTIFICATE OF SERVICE

I hereby certify that, on February 19, 2025, a true and correct copy of the foregoing document was served to the below listed parties via electronic means as listed on the Court's ECF noticing system or by electronic mail.

VIA EMAIL

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/s/ Katharine Battaia Clark

Katharine Battaia Clark